

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW MEXICO**

**IN RE:**

**FRED DALE VAN WINKLE,**

Debtor.

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No. 13-11743-j7

<b>AMENDED REPLY TO DEBTOR'S RESPONSE TO MOTION TO LIFT STAY</b>
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**Martin, Dugan & Martin**  
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**COME NOW Bellevue Valley Land Co., Inc., John H. Williams and Ellen B.**

**Williams** (*hereinafter jointly referred to as "Williams"*) by and through their attorney, W. T.

Martin, Jr., of Martin, Dugan & Martin, and for their *Reply to Debtor's Response to Motion to*

*Lift Stay* filed by **Fred Dale Van Winkle** (*hereinafter referred to as "Debtor"*) state:

1. The Motion seeking a lifting of the stay pertains to only the Debtor's Otero County property.
2. At this time Williams is not seeking a lift of the automatic stay on the Lincoln County property.
3. At such time as Williams may seek to have the automatic stay lifted on the Lincoln County property, the Debtor's response might become relevant. However, Debtor has already filed a motion seeking to avoid Williams' judicial lien on the Lincoln County property insofar as it adversely impacts Debtor's claim of homestead exemption. That matter is being dealt with separately from the issue involving lifting of the automatic stay on Debtor's Otero County property.

**Martin, Dugan & Martin**



By \_\_\_\_\_  
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Martin, Dugan & Martin certifies that the foregoing Reply was electronically filed with the Court via the CM/ECF system. All attorneys and parties identified with the Court for electronic service on the record in this case were served by electronic service in accordance with the CM/ECF system on the 8<sup>th</sup> day of October 2013.



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W. T. Martin, Jr.